

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

“All Track One Cases”

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**STIPULATED MOTION FOR
EXTENSION OF DEADLINES**

The parties hereby stipulate and move the Court for an extension of the deadline for Plaintiffs to file their oppositions to motions to dismiss for lack of personal jurisdiction to permit Plaintiffs adequate time to analyze Defendants’ discovery responses, as follows:

(1) Deadline for Plaintiffs to file opposition to Motions to Dismiss filed by Allergan plc (docket no. 1258) and Mallinckrodt plc (docket no. 1266) to June 21, 2019;

(2) Deadline for Plaintiffs to file opposition to Motion to Dismiss filed by Teva LTD (docket no. 1264) to July 5, 2019;

(3) Deadline for Allergan plc and Mallinckrodt plc to file any reply to July 12, 2019; and

(4) Deadline for Teva LTD to file any reply to July 19, 2019.

A Proposed Order is filed contemporaneously herewith.

Respectfully Submitted:

DATED: June 6, 2019

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser
Paulina do Amaral
LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
275 Battery Street
San Francisco, CA 94111
Tel: 415-956-1000
Fax: 415-956-1008
ecabraser@lchb.com
pdoamaral@lchb.com

Attorneys for Plaintiffs

DATED: June 6, 2019

/s/ Steven A. Reed

Steven A. Reed
Eric W. Sitarchuk
Rebecca J. Hillyer
MORGAN, LEWIS & BOCKIUS LLP
1701 Market St.
Philadelphia, PA 19103-2921
Tel: (215) 963-5603
steven.reed@morganlewis.com
eric.sitarchuk@morganlewis.com
rebecca.hillyer@morganlewis.com

Brian Ercole
MORGAN, LEWIS & BOCKIUS LLP
200 South Biscayne Boulevard, Suite 5300
Miami, FL 33131
Telephone: (305) 415-3000
Facsimile: (305) 415-3001
brian.ercole@morganlewis.com

*Attorneys for Teva Pharmaceuticals
Industries Ltd.*

DATED: June 6, 2019

/s/ Donna Welch

Donna Welch, P.C.
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654
(312) 862-2000
donna.welch@kirkland.com

Attorneys for Allergan plc

DATED: June 6, 2019

/s/ Brien T. O'Connor

Brien T. O'Connor
Andrew J. O'Connor
William Davison
ROPES & GRAY LLP
Prudential Tower
800 Boylston St.
Boston, MA 02199-3600
(617) 235-4650
Brien.O'Connor@ropesgray.com
Andrew.O'Connor@ropesgray.com

Attorneys for Mallinckrodt plc

CERTIFICATE OF SERVICE

I hereby certify that on June 06, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

DATED: June 06, 2019

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser